

Exhibit 2
Declaration of A.M.

Declaration of A M [REDACTED]

I, A. M. [REDACTED], declare as follows:

1. I make this declaration based on my own personal knowledge. If called as a witness, I would testify competently and truthfully to these matters.
2. I am a Plaintiff in this case, *Farmworker Association of Florida, Inc., et al. v. DeSantis, et al*, 1:23-cv-22655-RKA. I am fifty-seven years old and a U.S. citizen. I am one of the directors of a nonprofit organization, the [REDACTED], based in [REDACTED] Georgia. I have been a resident of Georgia for nearly forty years.
3. An arrest under Section 10 of SB 1718 would be disastrous for me and my nonprofit organization, as I am in charge of many of its operations.
4. I live in a rural community with some of the highest rates of poverty in Georgia. My job includes running a food pantry and clothing closet that are available to everyone in need in our community.
5. Transporting individuals with various immigration statuses, including individuals who have never had any contact with immigration authorities, is a key part of my job as well. Currently, I spend about 30% of my time assisting people with transportation. In the past ten years, I have driven individuals into Florida dozens of times. These transportation services include taking people in my personal vehicle from Georgia to Florida for various reasons, including to see medical specialists in Jacksonville, Florida.
6. I also personally transport individuals to appointments with the United States Citizenship and Immigration Service ("USCIS") for fingerprinting and other services. Some immigrants in my nonprofit's service area are directed to attend USCIS appointments in Jacksonville, even though they reside in Georgia.

7. Many undocumented immigrants need my assistance because they entered the United States without papers and are ineligible for a driver's license in the State of Georgia. They often don't have other viable options. Public transportation is limited or nonexistent in many rural communities in Georgia. I've personally encountered elderly and disabled people who ask our nonprofit for help because they can't even make it to the grocery store on their own.
8. If someone with an immigration application misses a USCIS appointment, there can be serious consequences. The individual could have his or her application delayed, denied, or can even be placed into removal proceedings. It is really important that people get to their USCIS appointments on time, and many would be unable to do that without my help.
9. Of course, there are also serious consequences for people who don't get the healthcare they need. A couple of years ago, a young undocumented man with heart problems and his friend reached out to our nonprofit organization to see if we could help with transportation. His primary-care physician had referred him to a cardiologist in Florida, but the young man's friend, who was also undocumented, was afraid of being arrested for driving without a license and decided he couldn't risk taking him to the cardiologist anymore. I decided to step in. The young man had an irregular heartbeat and urgently needed to meet with a specialist for follow-up. I drove him from South Georgia to a cardiologist in Orange Park, a suburb of Jacksonville, Florida. I took him to that appointment and he was able to get the care he needed.

10. An untreated issue like an irregular heartbeat can cause life-threatening complications. I think it's important that people with heart conditions obtain the healthcare they need to avoid hospitalization or death from heart failure.
11. Health problems for low-income people in my nonprofit's service area are a constant challenge. One of the women in my community was released from the hospital a week or so ago after being admitted for renal failure. Her stomach had been getting bloated and she had no idea how close to death she was. She is a middle-aged undocumented woman from the state of Yucatan, Mexico. Even though her condition is treatable, she may not make it. I don't know how long she is going to live because she doesn't have health insurance and local hospitals won't admit patients for dialysis if they don't have money or health insurance. In the area, her only option is to go to the emergency room. The closest dialysis center is in Dublin, Georgia, but she can't afford it. However, she needs a consistent course of treatment in order to get better.
12. This woman from Yucatan was given a list of places where she could go and get dialysis on a regular basis, which I believe includes a location in Jacksonville. I also worked with an agency based in Florida that wanted to help transport her out of the country for treatment.
13. As of the date of this declaration, she is in the hospital in [REDACTED] Georgia. She recently went to the emergency room in [REDACTED] Georgia for emergency dialysis and an ambulance transported her to [REDACTED] I don't know how long this situation can continue.

14. I am 100% willing to transport her to Florida or anywhere else she needs to go to get the care she needs. SB 1718, however, has made me extremely anxious that my efforts to help this woman may result in significant jail time and prosecution for me.

15. Although I have not been officially diagnosed with an anxiety disorder, I believe I suffer from anxiety, and I have been prescribed medication for depression in the past. My anxiety has taken a toll on me in the past few weeks thinking about the current risks of helping immigrants who need to travel into Florida for urgent reasons.

16. I currently have a U.S citizen individual who I am taking to a medical appointment in Jacksonville in the next two weeks. However, even in the case of transporting U.S. citizens, I believe I am at risk. Most people do not carry their passport or U.S. birth certificate with them. I personally had an encounter with a police officer several years ago where he insinuated that I didn't have a valid immigration status, even though I am a U.S. citizen. I don't feel safe now when I am traveling with passengers into Florida because few people are able to prove their citizenship or immigration status at a moment's notice.

17. I operate my nonprofit on a limited budget, and I would face extreme financial hardship if forced to pay for my release on bond or for my criminal defense if I were arrested. The transportation provisions of SB 1718 do not allow me to do my job effectively. These provisions also put real people's lives in jeopardy. I am willing to travel to Florida in order to help people in my community, but I believe I should not have to risk jail time in order to get them life-saving care or to help them attend an appointment with USCIS, or for any other legitimate reason.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28
U.S.C. § 1746.

Executed in [REDACTED] Georgia on August 05, 2023.

[REDACTED]